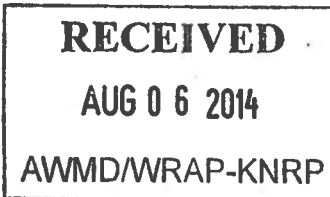




August 4, 2014

Brenda B. Epperson  
Environmental Manager  
MRP Properties Company, LLC  
P.O. Box 696000  
San Antonio, TX 78269-6000



**RE: 2013 Annual Groundwater Monitoring Report  
MRP Properties Company, LLC  
1400 South M Street, Arkansas City, Kansas  
RCRA ID# KSD087418695**

Dear Ms. Epperson,

The Kansas Department of Health and Environment (KDHE) conducted a teleconference with the United States Environmental Protection Agency (EPA) Region 7, MRP Properties Company, LLC (MRP), and MWH Americas, Inc. on July 30, 2014 to discuss MRP's Response to KDHE Comments on the 2013 Annual Groundwater Monitoring Report letter, dated July 15, 2014. The 2013 Annual Groundwater Monitoring Report (AGWR) provides a review of the groundwater monitoring program and on-going corrective action at the Former Total Petroleum, Inc. refinery in Arkansas City. KDHE finds MRP's response to KDHE's July 15th comments generally acceptable with the following caveats as discussed and agreed upon by EPA, KDHE, and MRP during the teleconference:

1. In an effort to better understand the relationship between the aquifer and the Walnut River in the northern part of the facility, MRP will install four monitoring wells (130, 131, 132, and 133) along the site boundary adjacent to the Walnut River. The addition of these wells to the existing monitoring well system will provide a better definition of groundwater potentiometric surface contours. Approximate locations of the wells are shown in attached Figure 1.

The wells will be installed according to the procedures described in Section 3.1 of Addendum No. 1 to the RCRA Permit Renewal Appendix P Groundwater Sampling and Analysis Plan (SAP). KDHE will allow MRP to blind drill these monitoring wells due to their proximity to locations previously logged using CPT/ROST. A geologist will visually observe the drill cuttings from the well borings to validate the accuracy of the existing CPT/ROST data. Proposed well depths and well screen placements are included in Figure 1, but may be modified based on field conditions encountered. The monitoring wells will be developed as stated in Section 3.1.2 of the SAP. MRP may characterize the investigation derived waste per special waste disposal testing requirements. The investigation derived waste will need to be analyzed for RCRA metals and benzene. MRP may choose to conduct total analyses then apply the 20 times rule to determine the need for TCLP analysis. Notification of field activities will be as described in Section 5.0 of the SAP.

RCRA



Ms. Brenda Epperson  
August 4, 2014  
Page 2 of 2

MRP will measure the static water levels at monitoring wells 130, 131, 132, and 133 and include this data in the groundwater level tables and the groundwater potentiometric surface contour maps that are included in the Quarterly Corrective Action Progress Report and Annual Groundwater Monitoring Report. It is anticipated that MRP will present monthly elevation data from the USGS monitoring station on the Walnut River at Arkansas City, with a projected surface water elevation proximal to the above wells, to help evaluate the relationship between surface water and groundwater. These measurements will be especially important during baseflow conditions.

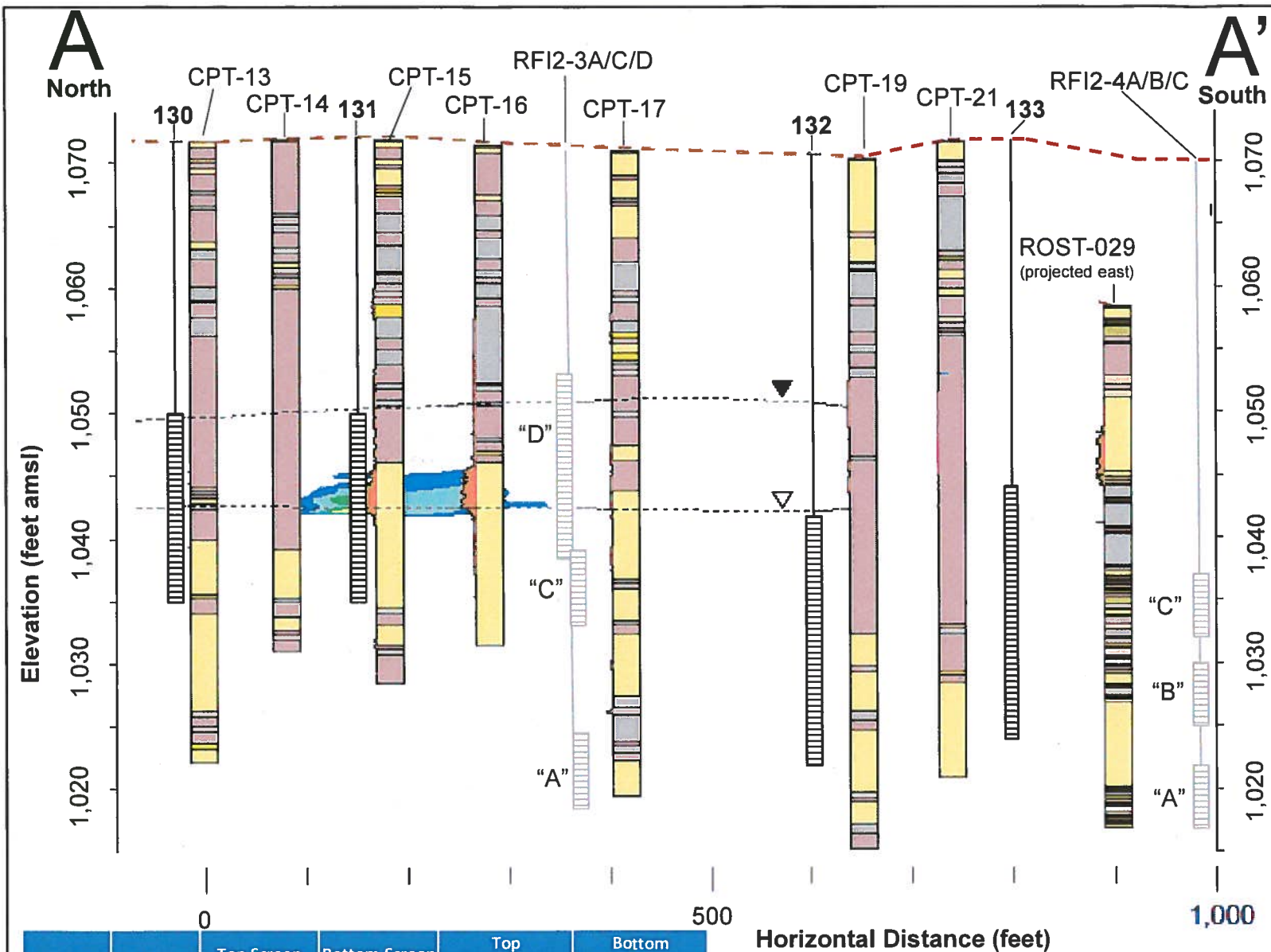
Based on the agreement reached as summarized above, KDHE and EPA hereby approve the 2013 Annual Groundwater Monitoring Report conditional upon installation of the aforementioned groundwater monitoring wells and reporting requirements. This letter will serve as an addendum to the 2013 AGWR and no further revisions to the document will be required. Please respond in writing by August 13, 2014 if MRP disagrees with the summary presented above. If you have any questions regarding this letter, please contact me by phone at (785)-291-3760 or e-mail at ([mvishnefske@kdheks.gov](mailto:mvishnefske@kdheks.gov)).

Sincerely,

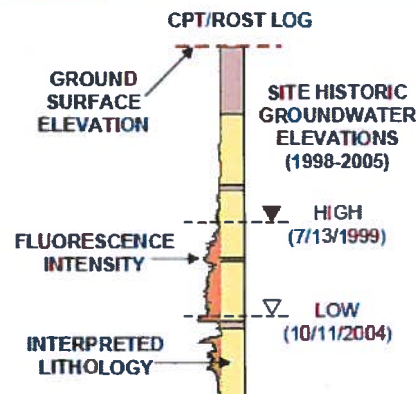


Mark Vishnefske  
Environmental Scientist III  
Hazardous Waste Corrective Action and Geology Unit

cc: Jay Mednick – MWH  
Brad Roberts – EPA Region VII - AWMD/WRAP  
Allison Herring – DEA/SCDO/Waste Programs  
Bill Bider – BWM



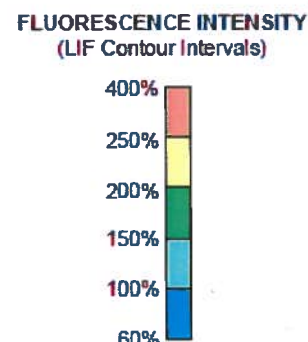
Well ID	TD (ft bgs)	Top Screen (ft bgs)	Bottom Screen (ft bgs)	Top Screen (ft amsl) Approx.	Bottom Screen (ft amsl) Approx.
130	37.5	22	37	1050	1035
131	37.5	22	37	1050	1035
132	48.5	28	48	1042	1022
133	48.5	28	48	1044	1024



**LITHOLOGY**  
(Interpreted from CPT)

- SANDS
- SILTY SANDS
- CLAYEY SANDY SILTS AND SILTS
- CLAYEY SILTS AND SILTY CLAYS
- CLAY

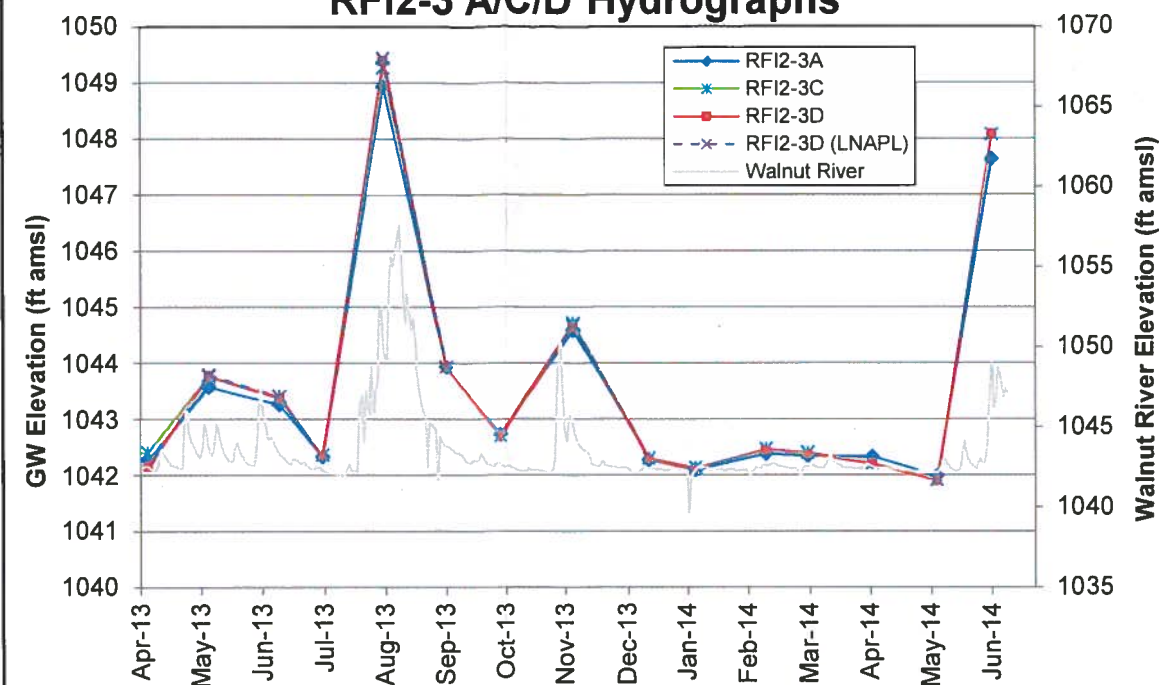
NOTE: Black indicates multiple interbeds



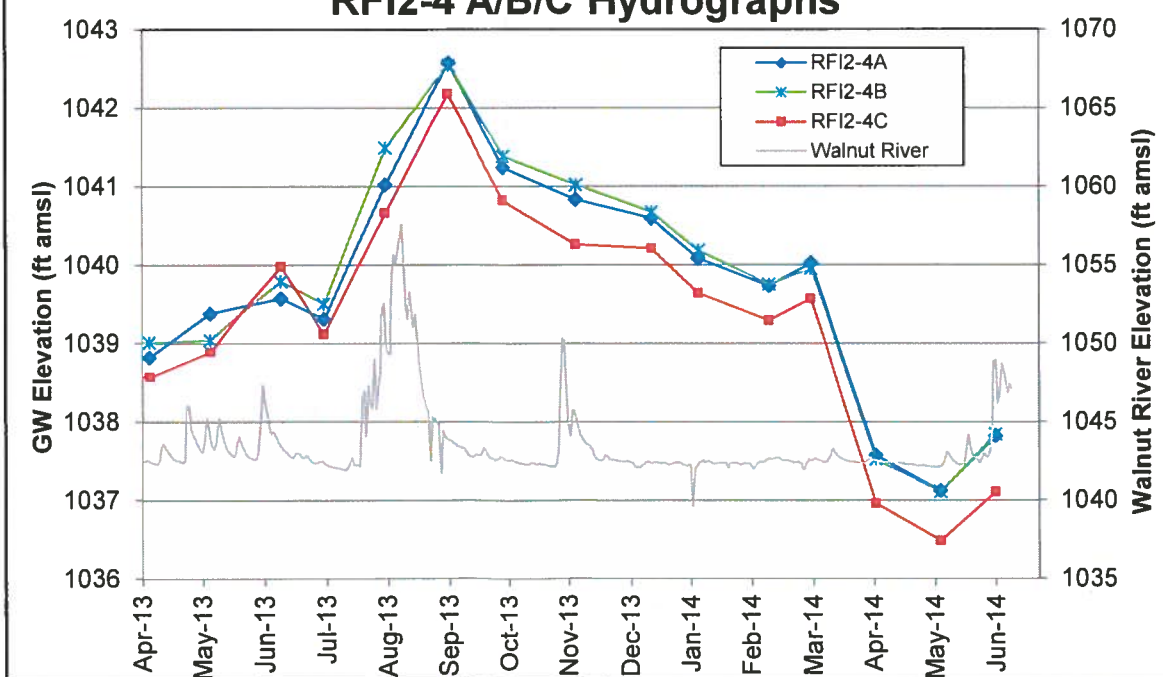
Location of Cross-Section A-A'



RFI2-3 A/C/D Hydrographs



RFI2-4 A/B/C Hydrographs



Notes: 1) AMSL = above mean sea level 2) CPT-13 = CPT/ROST Probe Location 3) Groundwater elevations dashed where inferred

Existing Well Screen  
Proposed Well Screen

## Cross-Section A-A' Proposed Well Construction

Project.: MRP Properties Company, LLC  
Arkansas City, Kansas



Figure No.: 1